Lessons Learned from Engagement in NATO's Building Integrity (BI) Programme

Milan S. Milutinović
Republic of Serbia, Ministry of Defence

Building Integrity

NATO OTAN

Integrity, Transparency and Accountability in the Defence and Security Related Sector



Building Integrity and Reducing Corruption in Defence and Security Sector

A Compendium of Best Practices
Volume II - September 2017

Lessons Learned from Engagement in NATO's Building Integrity (BI) Programme

DCAF

DCAF
a centre for security, development and the rule of law

Geneva Centre for the Democratic Control of Armed Forces

Building Integrity Compendium of Best Practices

Volume II

Introduction

Integrity, transparency and accountability in the defence and security sector are NATO core values. The decision to establish the NATO Building Integrity (BI) programme in 2007 recognises the importance of good governance; and the links between good governance and the impact of corruption on peace and security. Working together with NATO partners, the BI Programme has designed specific tools and mechanisms to help nations promote good governance and strengthen integrity, transparency and accountability in the defence and security sector. The BI Compendium of Best Practices is a key component of the BI tools made available to nations.

Volume I of the BI Compendium completed in 2010, focused on promoting good governance and addressing corruption risks in the defence sector. Volume II, presents lessons learned over the past decade, and provides an account of the practical experiences of Allies and partners. These contributions offer a unique perspective of the challenges confronting nations; and are being published and shared as part of the NATO BI commitment to promoting best practices. A consolidated publication, drawing together all individual contributions, will be published in the future. Volumes I and II together, will provide a 'library of best practices' for the growing BI community.

This contribution is the third to be published as part of Volume II. This article, written by Milan S. Milutinović and Stanko Lekić, sets out "**Lessons Learned From Engagement In NATO's Building Integrity Programme".**[1] The authors provide a step-by-step account of actions taken by Serbia, highlighting practical experiences and a number of lessons learned. This contribution provides a valuable insight into the challenges confronting personnel in the defence and security sector. This article will be of particular interest to nations considering taking part in the BI Self-Assessment and Peer Review Process.

The NATO BI Programme continues to welcome contributions to Volume II. A suggested list of topics and details on how to submit an article for publication can be found on the NATO BI website.



Dr. Alberto Bin
Director
Integration, Partnerships and Cooperation
Political Affairs and Security Policy Division
NATO

[1] The views expressed in this article are solely those of the authors.

Milan S. Milutinović,[1] Stanko Lekić[2]

LESSONS LEARNED FROM ENGAGEMENT IN NATO'S BUILDING INTEGRITY (BI) PROGRAMME

Executive Summary: This guide shares valuable lessons from Serbia's participation in NATO's Building Integrity (BI) Programme.[3] The Self-Assessment and Peer Review process was performed in cooperation with a NATO expert team in 2011. Following the diagnostic phase, risk areas were identified and a report was published. The results have been shared with the media, at international conferences, in academic publications,[4] and are now available in this NATO BI guide for countries. By the first quarter of 2013, the Ministry of Defence (MoD) and its 12 subordinated units had developed Integrity Plans and submitted them to Serbia's Anticorruption Agency. The first annual planning document - "Plan of Activities on Building Integrity at the MoD and Serbian Armed Forces" was adopted in December 2013, for 2014. It contained 22 specific measures organized into 5 focus areas. Starting from 2014, Annual BI Action Plans are being adopted regularly while from December 2015 analysis of their implementation is being performed at the end of each year and the findings are published at the web-site of the MoD. Experience achieved through participation in the NATO BI Programme significantly raised awareness of corruption risks and its harmful impacts, as well as the broad scope of anticorruption actions available to build integrity, increase transparency, and improve accountability. An unexpected benefit is the valuable cooperation and multiple engagements established with other international organizations, partner-states (on a bilateral basis), and non-governmental organizations. The ultimate aim is to improve national defence forces, make best use of scarce resources, enhance contributions to the alliance, and open up new opportunities for cooperative engagements with external partners.

Key words:

Integrity, corruption, Ministry of Defence, defence system, Serbia.

---

[1] Civil Servant Milan S. Milutinović, MA is the head of the European Integration Group in the Directorate of European Integration and Project Management, Defence Policy Sector, Ministry of Defence of the Republic of Serbia (www.deiup.mod.gov.rs, milan.s.milutinovic@mod.gov.rs).

[2] Commander Stanko Lekić is a desk officer at the Strategic Planning Department, Defence Policy Sector, Ministry of Defence of the Republic of Serbia (http://www.mod.gov.rs/eng/4314/uprava-za-strategijsko-planiranje-4314, stanko.lekic@mod.gov.rs).

[3] Source: NATO Internet presentation on the BI Programme: http://www.nato.int/cps/en/natolive/topics_68368.htm (accessed 01/10/2014).

[4] Subotić M, Milenković M, Milutinović M, *Importance of Education on Integrity Issues in Defence Sector, Theoretic,Cultural and Ethic Fundament of Practical Activities*, Bezpečné Slovensko a Európska Únia, Zborník príspevkov z 6. medzinárodnej vedeckej konferencie, Vysoká škola bezpečnostného manažérstva v Košiciach, Košice, 2012, 438-444.

Table of Contents:

Introduction

This NATO Building Integrity (BI) Guide shares lessons learned in navigating the Self Assessment and Peer Review process. Every country faces corruption risks. Militaries around the world address this problem in a variety of ways. Engagement in the BI Programme begins with NATO's "Self-Assessment Questionnaire" (SAQ). The SAQ offers a standardized diagnostic tool applicable to all NATO allies and partners.[5] It allows nations to evaluate strengths and weaknesses in the defence and security sector based on responses to a standard set of questions. It also offers the opportunity to capture and share results in a written report. The process is facilitated by a NATO Peer Review team. The goal of this NATO BI guide is to share valuable lessons learned from Serbia's engagement in NATO's BI Programme.[6]

Cultural differences among countries suggest there is no uniform agreement on types of behaviors and actions considered corrupt.[7] There is general awareness, however, that when defence officials use public funds and resources for private gain, this weakens defence forces, reduces trust in the military, and undermines the alliance.

NATO's SAQ process can help launch valuable discussions about how to make the best use of scarce defense resources. Key stakeholders and decision-makers need to be made aware that anticorruption efforts support the broader goal of good governance. This requires constant vigilance and careful coordination.

Three complementary strategic approaches to address corruption risks are recommended by NATO: i) Building Integrity, ii) Increasing Transparency, and iii) Improving Accountability.[8] Careful interpretation of SAQ responses, combined with cultural sensitivity, can lead countries to select the most relevant mix of strategies to minimize corruption risks and ensure the best use of defense resources. This NATO BI Guide shares lessons learned during a six-year engagement in the NATO Building Integrity Programme by the Ministry of Defence and the Armed Forces of Serbia.[9]

---

[5] "Building Integrity Self Assessment Questionnaire and Peer Review Process," NATO February 2014 (http://www.nato.int/nato_static/assets/pdf/pdf_publications/1402_BI-Self-Assess-Quest_en.pdf)

[6] The primary sources of information include reports on activities of the MoD within the Programme and planning documents adopted over the period. Additional data were collected from available literature and the internet.

[7] N. Slatinski, *Cultural Awareness in Implementing Integrity Building Programmes*, (2010) Building Integrity and Reducing Corruption in Defence, A Compendium of Best Practices, Geneva, NATO, DCAF, 312-322.

[8] See Chapter 2 of the NATO BI Compendium of Best Practices: http://www.nato.int/nato_static/assets/pdf/pdf_topics/20120607_BI_Compendium_EN.pdf

[9] The engagement reported here covers the period from December 2011 through June 2017.

1. Background: National level anticorruption activities

Prior to any assessment of corruption risks in the defence and security sector, it is useful to understand the impact of corruption in society as a whole. This requires building awareness of ongoing anticorruption efforts at the national level. This offers the context in which anticorruption efforts in the Ministry of Defence and Armed Forces can take place, and reveals realistic support likely to be available for those efforts.

In the 3 years prior to Serbia's engagement with the NATO BI Programme, top officials (including the President, Prime Minister, and the Spokesperson for the National Assembly) consistently warned that corruption represented a "first-class problem." They acknowledged corruption threatens the political process, public administration, the judicial system, and economic development, and distorts progress and impedes necessary changes in society.[10]

In May 2013, the director of Serbia's Public Procurement Office revealed that corruption in government contracts caused the country to suffer direct losses of approximately 600 million EUR per year.[11] This exceeded the annual defence budget over the three-year period 2012-2014.[12] Indirect losses might have been even higher.

Prior to 2012 the impact of corruption on the national economy was even greater. Some analysts estimate Serbia may have lost more than 5 billion EUR due to corrupt public procurement actions in the decade between 2002 and 2012.[13] In December 2010, the Head of the Delegation of the European Union to the Republic of Serbia[14] estimated the average annual loss in the national budget caused by public procurement corruption climbed "from 800 million to one billion EUR."[15] At the same time, he underlined the importance of

---

[10] A statement of the First Deputy-Prime Minister (currently the Prime Minister) of Serbian Government at the convention held before parliamentary elections, on 11/03/2014: http://www.novimagazin.rs/izbori2014/sns-konvencija-hala-sportova (accessed on 01/10/2014); A statement of the Spokesman of the National Assembly of Serbia:
http://www.politika.rs/rubrike/Politika/Korupcija-u-javnim-nabavkama-odnese-600-miliona-evra.sr.html (accessed on 01/10/2014).

[11] A statement of the Director of the Government's Public Procurement Direction given on 28/05/2013: http://www.b92.net/info/vesti/index.php?yyyy=2013&mm=05&dd=28&nav_category=9&nav_id=718017 (accessed on 10/10/2014)

[12] http://www.mod.gov.rs/multimedia/file/staticki_sadrzaj/informator/2013/1Tabele%20za%20INFORMATOR%20NOVEMBAR%202013.pdf (accessed on 10/10/2014).

[13] An estimation of Ms. Radojka Nikolić, former editor of economic section at the national journal "Politika" and the current main editor of monthly magazines "Biznis" and "Ekonometar" from Belgrade:
http://www.b92.net/info/vesti/index.php?yyyy=2013&mm=05&dd=28&nav_category=9&nav_id=718017 (accessed on: 10/05/2014)

[14] Information on the Conference "Public Procurement in practice", organized by the "Transparency Serbia" http://www.transparentnost.org.rs/index.php?option=com_content&view=article&id=101%3Akonferencija-za-tampu-javne-nabavke-u-praksi&catid=41%3Akonferencije&Itemid=53&lang=sr

[15] A statement of the Head of the Delegation of the European Union to the Republic of Serbia, Ambassador Vincent Deger: http://www.blic.rs/Vesti/Drustvo/223489/Srbija-gubi-milijardu-evra-godisnje-zbog-korupcije (accessed on: 01/10/2014)

increased oversight of procurement in the defence and security sector, since it includes many highly classified and secret expenditures.

On the national level, anticorruption efforts are supported by numerous laws and regulations.[16] The *United Nations Convention against Corruption* was ratified by the Republic of Serbia in 2005.[17] *The National Anticorruption Strategy* was first adopted by the Parliament in 2005[18] and remained in force until July 2013 when the new strategic document was launched, covering the period 2013 to 2018.[19] Several areas were listed as essential to address in developing and strengthening anticorruption tools. These included: political activities, public finances, privatization, public-private partnerships, the police and justice system, spatial planning and construction, healthcare, education, sports and the media.

In August 2013, the Government adopted the *Action plan for Implementation of the National Anti-Corruption Strategy in the Republic of Serbia for the Period 2013-2018*.The Action Plan defines concrete measures and activities to implement National Strategy goals, including deadlines, responsibilities and resources. The Action Plan was revised in June 2016 and the revised version is in force since July 7th 2016. The first session of the Coordination Body for the implementation of the Action Plan to administer the National Anti-corruption Strategy was held On September 15th 2014.[20] This newly founded Body consists of senior level officials including: the Prime Minister, Minister of Justice, Minister of Finance, as well as the Chairperson of the Government's Anticorruption Council.

[16] *Criminal Code*, *Contractual Relations Act*, *Law on the Anticorruption Agency*, *Law on Privatization*, *Law on the Privatization Agency, Law on Protection of Competition, Law on Public Procurement, Law on Free Access to Information of Public Importance, Law on Public Informing and Media, Law on Electronic Media, Law on Public and Media Services, Labor Law, Law on High Judical Council, Law on the State Prosecution Council, Law on Judges, Law on Public Prosecution, Law on the Judical Academy, Law on Financing Political Parties, Law on Planning and Construction, Law on Stirring Construction Industry in Conditions of Economic Crisis,* as well as the *Law on Safety of Sailing and Ports on Inland Waters*. The source: official internet presentation of the Government's Anticorruption Council:
http://www.antikorupcija-savet.gov.rs/content/cid1059/vazeci-zakoni (accessed on: 01/10/2014).

[17] Internet presentation of the United Nations Office on Drugs and Organized Crime (UNODC) https://www.unodc.org/unodc/en/treaties/CAC/signatories.html (accessed on: 01/10/2014).

[18] The first *National Anticorruption Strategy* from 2005 is available at the internet presentation of the Anticorruption Agency of Serbia: http://www.acas.rs/images/stories/Nacionalna_strategija.pdf
(accessed on: 01/10/2014), only in Serbian language.

[19] Both *the National Anticorruption Strategy* and *the Action plan for Implementation of the National Anti-Corruption Strategy* are available in English translation at the internet presentation of Serbian Ministry of Justice: http://www.mpravde.gov.rs/tekst/38/protiv-korupcije.php (accessed on: 02/10/2014).

[20] Source: official web-site of the Ministry of Justice: http://www.mpravde.gov.rs/en/vest/6938/the-first-meeting-of-the-coordination-body-for-the-implementation-of-the-action-plan-to-administer-the-national-anti-corruption-strategy-.php .

The intention is to expand this network by appointing a State Secretary[21] in each ministry to implement the Anticorruption Strategy in their respective agencies by 2018.[22] Another key initiative introduced at the national level to reduce corruption, is the requirement to engage independent Civil Supervisors for public procurements with an estimated value exceeding RSD 1 billion (roughly equivalent to 8.5 mil Euros).[23]

Serbia's Anticorruption Agency[24] is an autonomous and independent state body accountable to the National Assembly. It leads and coordinates activities of other governmental bodies in the area of anticorruption. On the basis of the *Guidelines for development and implementation of Integrity Plans*,[25] issued by the Agency on 29 October 2010, "all the state organs and organizations, organs of territorial autonomy and local self-government, as well as public services and public companies" had the obligation to develop and submit Integrity Plans by December 2012 (a deadline later postponed to 31 March 2013).[26] The task of developing Integrity Plans for Serbia's national defence organizations was fulfilled by 13 institutions (the Ministry of Defence and its 12 subordinated units), and is described in more detail below.

1.1. The Ministry of Defence's approach to anticorruption efforts

Along with the financial crisis, Serbia's National Anticorruption policy significantly influenced the Ministry of Defence. As part of their contribution to fiscal consolidation and in recognition of national anticorruption efforts, the Ministry of Defence declared a policy of "zero tolerance" for corruption and organized crime.[27] The aim is to provide the greatest possible level of security for the country and its citizens with limited resources.

[21] Starting from 2005, at Serbian system of public administration, the term "State Secretary" is being used for the public post previously named "Deputy-Minister" (remark of authors).

[22] The source: official internet presentation of the Government's Anticorruption Council: http://www.antikorupcija-savet.gov.rs/Storage/Global/Documents/stampa/Koordinaciono%20telo0001.pdf
The announcement on the first session of the Coordination Body for the implementation of the Action Plan to administer the National Anti-corruption Strategy on the internet presentation of Serbian Ministry of Justice: http://www.mpravde.gov.rs/en/vest/6938/the-first-meeting-of-the-coordination-body-for-the-implementation-of-the-action-plan-to-administer-the-national-anti-corruption-strategy-.php

[23] This requirement started with the new Law on Public Procurement, in December 2012. The source: Internet presentation of the Transparency Serbia: http://www.transparentnost.org.rs/index.php?option=com_content&view=category&id=37&Itemid=49&lang=en

[24] The source: internet presentation of the Anticorruption Agency of Serbia, www.acas.rs (accessed on 02/10/2014).

[25] The Guidelines for Development and Implementation of Anticorruption Plan from 2010 are available at the internet presentation of the Anticorruption Agency of Serbia: http://www.acas.rs/images/stories/Smernice.pdf (accessed on 02/10/2014).

[26] The source: Internet presentation of the Anticorruption Agency: http://www.acas.rs/component/content/article/41/323.html (accessed on 02/10/2014).

[27] The primary institutions responsible for combating defence corruption in Serbia include the: *Defence Inspectorate*, *Internal Audit Section* (directly subordinated to the Minister's Office), Military Security Agency,

Strengthening the integrity and accountability of individuals, and increasing the transparency of institutions (the rules, regulations, processes, and procedures that govern organizations), involves short-term, mid-term and long-term goals to reduce systemic corruption risks. There is high level of awareness that defence corruption undermines citizens' trust in the military, and damages the confidence of legislative and executive authorities that influence defence budgets.

2. Development of MoD Integrity Plans based on Guidelines from the Anticorruption Agency

On the basis of Guidelines provided by the Anticorruption Agency (hereinafter: the "Agency") issued 29 October 2010,[28] thirteen defence institutions were assigned the task of developing Integrity Plans to be submitted to the Agency by 31 March 2013. The process was initiated before the MoD formally became engaged in the NATO BI Programme.

The Working Group responsible for the Action Plans was coordinated by Secretariat of the MoD.[29] The work resulted in *Integrity Plans* developed for the following institutions and units: The Ministry of Defence, General Staff of Serbian Armed Forces, Land Forces Command, Air Force and Antiaircraft Defence Command, Training Command, Defence Inspectorate, Military Intelligence Agency, Military Security Agency, Military Medical Academy, Center of Military-Medical Institutions Belgrade, Military Medical Center Novi Sad, Military Hospital Niš and the Military Academy.[30]

It is important to note that execution of this task was undertaken with limited experience, and on the basis of broad, general guidelines developed for the public sector. These guidelines were considerably less relevant and applicable to the defence and security sector than the methodology offered later by NATO and Transparency International (TI), that focus specifically on the military.

Experience gained through participation in the NATO BI Programme, and in cooperation with TI, indicated that besides monitoring the implementation of existing Integrity Plans, it will be necessary to periodically update those Plans. Discussions with NATO and TI experts also make it clear the list of institutions required to produce Integrity Plans needs to eventually be enlarged. The NATO BI *Self-Assessment and peer Review Report* from 2012 pointed to the need for

Department of Military Police (subordinated to the General Staff of the SAF), and an Inspector General authorized to investigate work at the military security services – The Military Security Agency and Military Intelligence Agency.

[28] The source: Internet presentation of the Anticorruption Agency:
http://www.acas.rs/images/stories/Smernice.pdf (accessed on 02/10/2014).

[29] Secretariat of the MoD is an organizational unit equivalent to "Permanent Secretariat" or "General Secretariat" in ministries responsible for defense of other countries (remark of authors).

[30] The source: Internet presentation of the Anticorruption Agency:
http://www.acas.rs/images/stories/5.sistem_odbrane_novo.pdf (accessed on 02/10/2014).

Integrity Plans to be developed at several institutions responsible for areas of work identified as most vulnerable to corruption risks, and not currently required to develop Integrity Plans.[31]

Areas of work recognized as most vulnerable include: procurement, medical support and administration, conscription, emoluments regarding travel expenses, housing, compensation for combat injuries, and management of facilities and resources.[32] Institutions that house vulnerable areas of work include: The Material Resources Sector, Procurement Department, Human Resources Sector, Personnel Department, Military Healthcare Department, Budget and Finance Sector, and the Department for Tradition, Standard and Veterans of the Human Resources Sector.

The opportunity to combine national and international efforts is offered by the following example. During the development of Serbia's national *Integrity Plans*, a number of defence employees[33] freely revealed the presence of corruption. Since the international NATO-led Peer Review did not include analysis of corruption perceptions among staff, by including insights gained from national Integrity Planning activities, the combined efforts led to a more comprehensive and complementary understanding of the challenge of corruption.

The MoD recognized the need for a permanent joint structure to combine resources to develop national Integrity Plans, and engage in the international NATO BI Programme. Merging experience and results saves time, human and financial resources, and offers a more precise and cohesive approach to anticorruption efforts. The first step in that direction was taken by authorizing the Strategic planning Department of the Defence Policy Sector to develop, coordinate and supervise implementation of Annual BI Plans for the entire MoD and SAF, starting from 2014.[34] The valuable experience gained from this comprehensive approach can be shared with partner-states, and international and non-governmental organizations. **[LESSON: INTEGRATE NATIONAL AND INTERNATIONAL ANTICORRUPTION EFFORTS IN A COMPREHENSIVE APPROACH]**

[31] *The Self-Assessment and Peer Review Report* from November 2012 is available at the internet presentation of Serbian MoD: http://www.mod.gov.rs/sadrzaj.php?id_sadrzaja=4353 (accessed on 02/10/2014).

[32] The same: *Self-Assessment and Peer Review Report*, Overview, bullet 6.

[33] During development of Integrity Plans, the intention was to perform the evaluation by as many a possible personnel of the MoD and Serbian Armed Forces. Necessary measures were also taken to provide that evaluation has to be performed by those individuals who know most on issues related to corruption, based on the scope of their professional responsibilities.

[34] Plan of Activities on Building Integrity at the Ministry of Defence and the Serbian Armed Force in 2014.

3. Engagement in the NATO Building Integrity Programme

Talks about engaging in the NATO BI programme were initiated in May 2011, during the visit of a representative of the NATO Political Affairs and Security Policy Division - PASP. The Ministry of Defence of the Republic of Serbia (MoD) and the Serbian Armed Forces (SAF) joined the NATO Building Integrity Programme at the end of 2011, roughly four years after NATO's initial launch of the programme. Later, in December of that year, NATO's Ambassador for the Building Integrity (BI) Programme visited Belgrade where he met with the State Secretary of the MoD. The primary aim of that meeting was to introduce the goals of the BI Programme to the MoD's management team. The NATO BI *Self-Assessment Questionnaire* (SAQ) was also presented to representatives of the Ministry, establishing the formal beginning of Serbia's engagement in the NATO BI Programme.

3.1. Answering the BI Self-Assessment Questionnaire (SAQ)

The process of collecting and compiling responses to the SAQ lasted nearly three months. It was decided to prepare responses by establishing a broad working group. Instead of awarding the task to a small team of experts, a large working group was established at the level of the entire MoD and SAF. The working group included 17 representatives of relevant organizational units.[35] Representatives of defence institutions in the Working Group were provided copies of the SAQ and asked to prepare answers to the best of their abilities within their units (in collaboration with subject matter experts). **[LESSON: ESTABLISH A BROAD REPRESENTATIVE WORKING GROUP WITH MIX OF CIVILIAN (MOD) AND MILITARY (ARMED FORCES)]**

The Strategic Planning Department of the Defence Policy Sector coordinated the working group's activities and composed a final list of responses (as well as providing comments and recommendations later in the Peer Review process). The State Secretary (the second highest ranking position in the MoD) was

[35] Minister's Office, Office of the Chief of General Staff, Defence Policy Sector, Human Resources Sector, Material Resources Sector, Budget and Finance Sector, personnel Department, Strategic Planning Department, Department for International Military Cooperation, Strategic Research Institute, Planning, Programming, Budgeting and Execution (PPBE) Section, General Inspector of Services, Defence Inspectorate, Secretariat of the MoD, Public Relations Department, Military Healthcare Department, Military Intelligence Agency and Military Security Agency. General Staff of Serbian Armed forces sent to the Working group representatives of the Office of the Chief of Defence, Planning and Development Department (J-5), as well as the Department of Military Police. Heads of all the listed units met the NATO experts' team later (in the phase of peer Review) and through the form of expert's talks answered the questions related to the Self-Assessment Questioner and answers to it, given in written form.

appointed to head the Working Group to emphasize top level political support, and to provide greater authority to the Working Group. **[LESSON: ENGAGE TOP LEADERSHIP SUPPORT]**

A list of assignments was created to respond to each question in the SAQ. The list identified a unit with primary responsibility for each question based on their functional expertise and area of authority. Other relevant units were assigned to work with the primary units in drafting responses. Although the attempt to include all relevant stakeholders complicated the SAQ process, it also provided for greater accuracy and reliability in the responses. Other benefits of this inclusive approach included broader communication and awareness of the issues. The completed questionnaire (SAQ) was returned to the NATO International Staff in advance of the scheduled deadline. **[LESSON: RESPECT TIMELINES, INCLUDE ALL RELEVANT STAKEHOLDERS, AND CLEARLY ASSIGN RESPONSIBILITY]**

3.2. Methodology applied during the Peer Review process

The first visit of NATO Peer Review experts took place three months after submission of the completed SAQ. This international team visited the MoD, and other state institutions relevant to BI efforts in the defence sector. A total of three peer review team visits took place between June and November 2012.[36] The peer review teams consisted of anywhere from two to four members, selected on the basis of their experience in the fields of defence management, defence policy, foreign policy, public administration, and defense budgeting. Meetings and interviews were not only held with the MoD and SAF, but also with representatives of the National Assembly (Committee of Defence and Internal Affairs, and the Committee of Judiciary, Public Administration and Local Self-Government), the Anticorruption Agency, Government's Anticorruption Council, the Ministry of Foreign Affairs, the Ombudsman, and the Commissioner for Information of Public Importance and Personel Data Protection.[37] **[LESSON: EMPLOY A WHOLE OF GOVERNMENT APPROACH—ENGAGE ALL RELEVANT ORGANIZATIONS INSIDE AND OUTSIDE DEFENSE]**

---

[36] In the period from June to November 2012, three visits of the expert team were performed (two of them lasting 3 days and one a single day), during which there were 29 meetings (21 meetings at the MoD and the SAF General Staff, plus 8 meetings to other relevant state institutions).

[37] Upon the request of the NATO expert team, meetings with representatives of several institutions of special importance for the result of the Self-Assessment and Peer Review were held twice (in June and September 2012).

A single Serbian representative was appointed by the MoD to record all peer review talks and meetings held during official visits.[38] In the subsequent implementation phase, the same person was assigned as a permanent point of contact (POC) for BI issues. This POC provided continuous and comprehensive insight into the content of all meetings offering regular, detailed written reports. In turn, this helped lay the foundation for later efforts and activities. **[LESSON: ENSURE CONTINUITY OF EFFORT BY ASSIGNING ONE PERSON AS PERMANENT POC RESPONSIBLE FOR REPORTING ON ALL NATO BI ENGAGEMENTS]**

Responses to selected questions in the Self-Assessment Questionnaire were audited through the use of expert interviews. Additional interpretation of some answers was requested, especially as they related to current norms that influence integrity and anti-corruption efforts in the defence sector, and the consistency of their application. Following each visit, the NATO expert team delivered an updated version of the draft Self-Assessment and Peer Review Report. The MoD subsequently analyzed and commented on the draft, and offered amendments to the report. The draft gradually took shape until the report was acceptable to both sides. The final details were agreed at the last meeting held in the Strategic Planning Department, attended by the Assistant Minister for Defence Policy. During this meeting the final draft report (in both English and Serbian) was analyzed paragraph by paragraph by both sides, to iron out remaining issues.

A careful, collaborative, iterative process results in a more useful and better quality report. Where there is any disagreement on issues, this can be (and was) documented in footnotes and explained in a transparent manner. The final Self-Assessment and Peer Review report was published on the MoD's official website in both Serbian and English on 28 November 2012.[39] **[LESSON: COORDINATE CLOSELY WITH THE NATO PEER REVIEW TEAM TO ENSURE THE FINAL REPORT IS BOTH CREDIBLE AND USEFUL FOR ALL PARTIES]**

The approach taken by the MoD to broadly engage in expert interviews and to share written reports from meetings and discussions with institutions whose representatives had participated, helped create a strong network committed to building integrity in the defence and security sector. NATO's Assistant Secretary General for Political Affairs and Security Policy later praised the approach taken by the MoD in a letter addressed to the Assistant Minister for Defense Policy.[40] **[LESSON: THE SAQ PROCESS CAN IMPROVE**

---

[38] The average length of meetings was 75 minutes during which expert interviews were conducted with representatives of 23 organizational units of the MoD and SAF

[39] The Source: Internet presentation of Serbian MoD: http://www.mod.gov.rs/multimedia/file/staticki_sadrzaj/dokumenta/integritet/samoprocena_integriteta_eng.pdf

[40] The Source: Internet presentation of Serbian MoD (letter dated 12 December 2012):

INTERNAL COMMUNICATION, INCREASE MUTUAL TRUST, AND STRENGTHEN EXISTING AND BUILD NEW NETWORKS RESPONSIBLE FOR ANTICORRUPTION INSIDE AND OUTSIDE DEFENCE]

Instead of soliciting responses to SAQ questions only from organizations and activities directly responsible in terms of their work and area of expertise (risking a positive bias)—the NATO Peer Review team repeatedly asked the same questions of representatives from different organizational units that interact with each other. The answers sometimes varied significantly. Integrated reports later delivered to all units visited and interviewed by the NATO experts revealed weaknesses in procedures and relationships between some components of the defence system previously hidden from managers of these units (as well as to top level MoD management). This enabled the MoD to tailor certain measures to overcome some of the problems identified. **[LESSON: ASK THE SAME QUESTIONS TO DIFFERENT PARTS OF THE ORGANIZATION, AND TO DIFFERENT ORGANIZATIONS THAT INTERACT, TO DETERMINE IF ANSWERS ARE ROBUST AND REVEAL WEAKNESSES THAT NEED TO BE ADDRESSED]**

3.3. Conclusions from the Self-Assessment and Peer Review process

The publication of the NATO Self-Assessment and Peer Review Report displayed a new level of commitment to transparency by the MoD. It allows public access to a large amount of information related to defence and security, and encourages civil society organizations to get even more actively involved in these issues. Shortly after publication of the Report, the MoD received numerous comments and recommendations from civil society organizations related to combatting corruption. The recommendations were carefully reviewed and some of them subsequently included in annual anticorruption plans for the MoD, from 2014 to 2017.

The openness demonstrated in the Self-Assessment and Peer Review process with NATO created new opportunities for the MoD. A similar model of cooperation was established with the Defence and Security Programme of Transparency International (TI-UK), as well as with local non-governmental organizations involved in measuring corruption risks in national defence systems, within the TI project "Government Defence Anti-Corruption Index".[41] **[LESSON: INCREASE TRANSPARENCY BY MAKING THE SELF-ASSESSMENT AND PEER REVIEW REPORT WIDELY AVAILABLE**

---

http://www.mod.gov.rs/multimedia/file/staticki_sadrzaj/dokumenta/integritet/Letter%20ASG%20to%20Asst%20Min%2010%20DEC%202012.pdf .

[41] Web-site of the GI research: http://government.defenceindex.org (accessed 30/06/2017).

TO ENCOURAGE CIVIL SOCIETY TO GET INVOLVED AND PROVIDE SUPPORTING RECOMMENDATIONS]

3.4. Action plans following publication of the Self-Assessment and Peer Review Report

To reduce corruption risks, the Self-Assessment and Peer Review Report contained 34 recommendations to improve norms and operating procedures. It also proposed establishing new institutions in the defense system of the Republic of Serbia, and extending the responsibility of existing institutions. These recommendations served as a basis for the first "Annual Plan of Activities on Building Integrity at the MoD and the Serbian Armed Forces" in 2014 (hereinafter: the "Annual Plan"), signed by the Minister of Defence. The plan includes twenty two measures divided into five focus areas: 1. Democratic control, 2. Education and training, 3. Planning and budget, 4. International operations, and 5. Relations with the Serbian defence industry and other suppliers. All the subsequent Annual Plans and yearly survey of their implementation are available on the web-site of the MoD.[42] **[LESSON: DEVELOP ACTION PLANS WITH HIGH-LEVEL ENDORSEMENT]**

Among the more important measures included in the first Annual Plan are: 1) implementation of the *National Anticorruption Strategy*; 2) implementation of *Integrity Plans* based on Anticorruption Agency guidelines; 3) increased cooperation with the Anticorruption Agency, and training to raise awareness; 4) evaluation of progress in implementing NATO BI expert team recommendations; 5) cooperation with Transparency International; 6) development of a *Strategic Communication Plan* to inform the public about progress by the MoD and SAF in implementing anti-corruption measures; 7) communicating issues of BI accountability and transparency within the MoD and SAF in national and foreign media; 8) an information campaign to promote integrity, accountability and transparency in the recruitment process and with new staff; 9) identifying a *list of "sensitive positions"* in the MoD and SAF based on the need for integrity to counter corruption risks; 10) performing audit of procedures and developing a *system of rotation at sensitive positions*; 11) establishment of educational modules to train MoD and SAF personnel on the basis of the NATO BI Education and Training Plan; 12) Education in the area of BI for a group of MoD and SAF experts in cooperation with Transparency International and the Defence Academy of the United Kingdom; 13) development and improvement of the Planning, Programming, Budgeting and Execution (PPBE) system; 14) higher levels of education for individuals performing the duty of auditors; 15) development of an anti-corruption

[42] Official web site of Serbian MoD, sub-domain "Building Integrity": http://www.mod.gov.rs/cir/4353/izgradnja-integriteta-4353 (accessed on 30/06/2017).

education module for forces to be delivered before deployment to theatre of operations abroad; 16) defining a list of companies registered for production of weapons and military equipment authorized to deal with trade of weapons and military equipment and suitable to provide services for the MoD and SAF; 17) providing confidentiality of agreements, implementation of prescribed security measures and protection in implementation of contracts; 18) forming tender commissions in a more transparent and professional manner; 19) establishment of effective procedures for procurement in order to provide full transparency; and 20) development of a Human Resources management plan for the Procurement Department of the material Resources Sector to increase efficiency and implement new regulations regarding rotating staff assignments.[43] It is important to note that the second Annual Plan (for 2015) was translated to English and distributed externally in a joint publication with NATO.[44]

The MoD needs to closely coordinate BI activities with other governmental institutions. For example, legal changes are occasionally required at the national level to implement changes in the MoD. It may also be important for investigating authorities to be provided expanded powers similar to those available in Western countries. **[LESSON: COORDINATE LEGAL AND REGULATORY ANTICORRUPTION EFFORTS WITH OTHER GOVERNMENT INSTITUTIONS AND DEFINE THE APPROPRIATE SCOPE OF AUTHORITY AND RESPONSIBILITY]**

Impact of Engagement in the NATO BI Programme on other Anti-corruption Activities

The NATO Building Integrity Programme is not the only structure through which Serbia's MoD and Armed Forces operate in order to reduce corruption risks and strengthen defence sector institutions. Besides this program, and ongoing activities of MoD organizational units, it is important to mention national-level activities (which include development and implementation of Integrity Plans in all the institutions of the defence system), bilateral cooperation with partner-states (primarily Norway, USA and Great Britain), as well as cooperation with relevant international and non-government

[43] Over the period from 2012 to 2014, representatives of MoD and SAF participated in multiple education and training programs, and expert meetings organized by the NATO Building Integrity Programme. The Ministry of Defense hosted two international BI workshops, organized in cooperation with NATO, DCAF and the UNDP / SEESAC. The workshop on Integrity in Defence Budgeting and Finance was held in Belgrade in June 2013 while the workshop treating issues of Outsourcing and Public-Private Partnerships in Defence Sector was organized in June 2014, at the same place. Each worhshop had over 60 participants from Serbia and states-participants of the NATO BI Programme.

[44] Building Integrity: Process and Impact Serbia, NATO, Brussels, 2015. http://www.mod.gov.rs/multimedia/file/staticki_sadrzaj/dokumenta/integritet/Publikacija_IZGRADNJA_INTEGRITETA_Procesi_i_uticaji_Srbija_srpski_en.pdf (accessed on 30/06/2017).

organizations.[45] However, the NATO BI Programme offers a powerful framework, and valuable knowledge that can be applied to these and other related activities. Translating key NATO BI documents,[46] including the new BI guides, into the working languages of partner countries would offer significant value, enabling a greater number of defence personnel to become acquainted with best practices. **[LESSON: USE ENGAGEMENTS WITH NATO BI AS A USEFUL FRAMEWORK TO HARMONIZE OTHER ANTICORRUPTION EFFORTS]**

3.1. Cooperation with Transparency International United Kingdom (TI-UK)

In January of 2012. (two months after Serbia's engagement in the NATO BI Programme); the Programme director of Transparency International United Kingdom (TI-UK) revealed a measure of integrity and corruption risks in the MoD and SAF. In August of 2012, TI UK delivered a report on the completed research named “the Government Defence Anti-Corruption Index (GI).”[47] The report provided detailed scoring of Serbia's defence system, as part of world-wide research covering 82 national defence systems. Our country was ranked in the category “D+”, among states in which there was a “high level of corruption risk in defense sector”. The scoring for Serbia was based on data obtained from a civil society organization named “the Belgrade Center for Security Policy” and did not include participation of a MoD representative.

Upon receiving the results, the Serbian MoD delivered their comments to TI-UK. The most significant comment was that TI’s research was carried out without any participation of Serbia's defence institutions, and was based on secondary sources (such as daily press, and statements by non-governmental organizations). These comments were published as part of the TI UK web presentation, as well as on Serbia’s MoD website, though as a separate document which did not influence the scores. Over the same period, significant efforts took place to establish direct contact with representatives of TI UK, and several bilateral meetings were held.

Given the MoD’s copious remarks on the research results, as well as acknowledgement by TI-UK members’ that the mechanism assessment design

[45] Activities of special importance to Serbia include: participation in the “the Government Defence Anti-Corruption Index” research project led by TI-UK, and cooperation with the UNDP/SEESAC Office in Belgrade. The announced interest for cooperation among other organizations which support BI oriented projects in Serbia (such as the OSCE) is also valuable.

[46] Tagarev, T. (2013) *Izgradnja integriteta i smanjenje korupcije u sektoru odbrane, zbornik najboljih praksi*, Beograd, NATO, DCAF, CIDS. Source: web page of the Belgrade Centre for Security Policy: http://www.bezbednost.org/Vesti-iz-BCBP/5276/Izgradnja-integriteta-i-smanjenje-korupcije-u.shtml.

[47] Web page of the Transparency International Government Defence Anti-Corruptiin Index: http://government.defenceindex.org (accessed on 30/06/2017).

was still under development, the decision was made that future assessments should be conducted through more intensive information exchanges between the MoD, TI-UK, and local non-governmental organizations. Together they participated in scoring, using positive experiences gained from engagements with the NATO BI Programme, especially the Self-Assessment and Peer Review report. This new approach has been established to connect and include several relevant stakeholders in the research in order to ensure complete and objective scoring.[48]

Within two years a significant progress was achieved. Scores for second cycle of the Government Defence Anti-Corruption Index (GI) were published on December 3rd 2015. This time, Serbia took place in the category "C" (moderate level of corruption risk in defense sector).[49] Out of maximal 288 points, 154 were obtained. Compared to the previous result (from 2012) positive trend was confirmed in 35 of 77 indicators (about 45.45%), while negative trend was identified in 11 of 77 indicators (14.28%). In the final report, the Transparency International U. K. stated that "Serbia had made significant progress adopting legal changes aimed at reducing corruption risks in areas of procurement, personnel and oversight." As the most notable initiatives, TI mentioned "the 2013 Public Procurement Act and attendant bylaws, the 2014 Whistleblower Act, and new Parliamentary Rules of Procedure reorganizing parliamentary oversight of defense and intelligence organizations".

Certain criticism was expressed regarding the findings that a prohibition on military officers' involvement in commercial activities was relaxed, that the internal audit unit in the MoD did not have sufficient financial and human resources, and it was not clear how strong or active it was, as well as that the The State Audit Institution had a limited role over defense spending and could not scrutinize the "appropriateness" of procurement.

The Ministry kept on developing and applying measures tailored to ensure accountability, transparency and integrity in defense affairs, in order to achieve "zero tolerance" for corruption and organized crime. Recommendations given by the Transparency International were also partly built in Annual BI Plans for 2016 and 2017.

---

[48] In accordance with the lessons learned, at the beginning of the second cycle of research "The Government Defence Anti-Corruption Index", which will be published in 2015, a meeting was held in Belgrade on 24.04.2014, with the head of this research project. The meeting was attended by representatives of the National Assembly Defence and Internal Affairs Committee, Anticorruption Agency, Ministry of Internal Affairs and the local NGO "Belgrade Center for Security Policy" which scores presence of the risk of corruption advent in Serbian defence system (using a standardized TI UK questionnaire as the guidelines) to meet the needs of the TI UK.

[49] Web page of the Transparency International Government Defence Anti-Corruptiin Index, Scoring of Serbia: http://government.defenceindex.org/countries/serbia 30/06/2017.

An added value gained from TI-UK's "Government Defence Anti-Corruption Index" is access to the assessment questionnaire, similar to the SAQ, and the guidelines for evaluators, along with the report evaluating Serbia's defence forces. This material (originally in English) was translated by the MoD to Serbian language and forwarded to relevant organizational units. This provides another tool which can be used to perform internal measurements of corruption risks (on the whole system or its selected parts), and offers the possibility to track progress over time.

Based on the level of improved communication during the second cycle of the GI research (2014-15), the MoD has held numerous meetings with other representatives of TI UK and the UK Defence Academy to advance cooperation on education and training. Regular practice of joint workshops in Serbia was established and Serbian defense personnel started to take specialist multi-week training in London through a program funded by the United Kingdom. Possible cooperation was also considered in development of national BI trainings and courses for the defense establishment and the forces in preparation for multinational operations.

[LESSON: PRO-ACTIVELY ENGAGE IN NATO BI AND OTHER ANTICORRUPTION INITIATIVES]

4.2. Cooperation with the "Belgrade Center for Security Policy"

Thanks to the cooperation, mutual trust and respect established through joint work on the forthcoming 2015 "Government Defence Anti-Corruption Index," Serbia's MoD and the Belgrade Center for Security Policy have expanded their cooperation to jointly participate in the project named "Partnership for Integrity in Security Sector of the Republic of Serbia", being managed by the BCSP and funded by USAID.

Minister of Defense accepted to attend conferences organized by this think-thank, and take role of a keynote speaker on issues of budgeting, finance, procurement and anti-corruption. Such practice became regular from 2014 to 2017. Understanding the needs to discuss scores of researches from 2012 and 2015, the Minister of Defence held a meeting with representatives of the Belgrade Center for Security Policy on July 13th 2016.

Within the same programme, inter-ministerial consultations on the Serbian security sector were held to discuss issues of BI.[50] Significant recommendations

[50] The event gathered representatives of the Parliament, MoD, Ministry of Internal Affairs, Security-Informative Agency, the Ombudsman's Office, Commissioner for Information of Public Importance and Personal Data protection, Anticorruption Agency, Government's Directorate of Public Procurement, the Belgrade Center for Security Policy, as well as the "Transparency Serbia".

from these consultations included several possible improvements of work procedures at the MoD:

- increase coordination in management of BI-related processes, by forming a single permanent anticorruption working group;
- regularly inform MoD personnel of available vacant posts and career advancement possibilities;
- define more precisely the role of the Defence Inspectorate (Inspector General) in the BI process, and eventually establish a new organizational unit within it responsible to build integrity, increase transparency and improve accountability in the defence system;
- perform regular, comprehensive audits of accounting records of mobile and immobile property and assets in the defence system conducted by the Internal Audit Sector;
- establish the post of Defence Ombudsman and define the relationship with any existing Ombudsman that has general jurisdiction over the whole of government.[51]

4.3. Sharing experience with foreign partners

During six years of participation in the NATO Building Integrity Programme and due to cooperation with other external partners, Serbian Ministry of Defence had an opportunity to expand its perception of anti-corruption issues, adopt advanced methodology and train its personnel. We could also upgrade and present to external audience the expertise which already existed within our system, but was less visible from outside.

Representatives of Serbian MoD were invited and supported by NATO to share their experience, as lecturers in Armenia, Moldova and Kazakhstan. NATO International Staff organized a meeting of Serbian and Armenian experts in Brussels, in order to support anti-corruption efforts of the Armenian side, with an accent on defense procurement.

The authors of this paper were members of the international Project team which developed the NATO BI Reference Curriculum for educators in 2015-216.[52] That was the first case that any Serbian defense official participated in creation of such a publication, which was inspired by the previous NATO Defense

[51] Following this program, on September 17. 2014, the first conference was held in the presence of the US Ambassador in Serbia, the Minister of Defence and the State Secretary of the MoD The Source: internet presentation of the Belgrade Center for Security Policy, announcement of the conference within the project „Partnership for Integrity in the Security Sector of Serbia“:
http://www.bezbednost.org/Events/5593/Partnership-for-Integrity-in-Security-Sector-in.shtml

[52] *Understanding the Impact of Good Governance and Corruption on Defence Institution Building A Reference Curriculum for Educators*, NATO, Brussels, 2016.
Retrieved from: http://www.nato.int/cps/nl/natohq/topics_139166.htm 30/06/2017.

Education curricula.[53] Positive experience from the previous period provides a solid base for willingness and capability to keep on joint work in the years that come.

5. Conclusion

Participation in the NATO Building Integrity Programme has raised the level of awareness of the importance of building integrity, increasing transparency and improving accountability in the defence and security sector. It has also enhanced everyone's knowledge of the subject involved in the process. There is a new understanding of unwanted forms of behavior that can be categorized as corruption that were not previously understood before. Valuable experience gained from the NATO BI Programme has encouraged cooperation with external partners in dealing with issues of integrity, transparency and accountability in combating corruption. Opportunities to engage in education and training programs and expert meetings have been especially significant in anticorruption efforts, as well as the knowledge gained from the Self Assessment and Peer Review Process, the BI Compendium of best practices, and cooperation with NGOs and the media. An unexpected benefit is to improve the scope and quality of information exchanges with Transparency International's Defence and Security Programme, and local NGOs (primarily "Belgrade Center for Security Policy" and "Transparency Serbia").

Activities implemented within the BI Programme increased the interest of other international organizations that look to maintain or improve cooperation with the MoD. The NATO International Staff has offered multiple opportunities to the MoD to present its experience to other interested participants including through this publication. In the spirit of transparency, the Serbian Ministry of Defence will continue to actively participate in the BI Programme and share its experience with NATO partners and allies.

[53] NATO Defense Education Curricula, edited by the Partnership for Peace Consortium (PfPC): http://www.pfp-consortium.org/index.php/pfpc-products/education-curricula 30/06/2017.

Literature

Official Documents:

Republic of Serbia, Ministry of Defence, Integrity Plan, Belgrade, March 2013;

Republic of Serbia, Ministry of Defence, Plan of Activities on Building Integrity at the Ministry of Defence and the Serbian Armed Force in 2014, Belgrade, December 2013;

Republic of Serbia, Ministry of Defence, Reports of organizational units on performed activities related to BI issues in period from December 2011 to October 2014.

Building Integrity: Process and Impact Serbia, NATO, Brussles 2015. http://www.mod.gov.rs/multimedia/file/staticki_sadrzaj/dokumenta/integritet/Publikacija_IZGRADNJA_INTEGRITETA_Procesi_i_uticaji_Srbija_srpski_en.pdf

Guides and Handbooks:

Tagarev, T. (2010) *Building Integrity and Reducing Corruption in Defence, A Compendium of Best Practices*, Geneva, NATO, DCAF.

Tagarev, T. (2013) *Izgradnja integriteta i smanjenje korupcije u sektoru odbrane, zbornik najboljih praksi*, Beograd, NATO, DCAF, CIDS.

Петровић, П. (2013) *Корупција у сектору безбедности Републике Србије*, Београд: Београдски центар за безбедносну политику.

Petrovic, P (2013) *Corruption in the Security Sector in Serbia*, Belgrade Center for Security Policy. http://www.bezbednost.org/upload/document/corruption_in_the_security_sector_in_serbia.pdf

Understanding the Impact of Good Governance and Corruption on Defence Institution Building A Reference Curriculum for Educators, NATO, Brussels, 2016.
Retrieved from: http://www.nato.int/cps/nl/natohq/topics_139166.htm 30/06/2017

Databases Accessible Online:

Internet presentation, National Assembly of Serbia:
www.parlament.rs
Internet presentation, Government of the Republic of Serbia:
www.srbija.gov.rs
Internet presentation, Republic of Serbia, Ministry of Defence:
www.mod.gov.rs
Sub-domain covering issues of building integrity, Republic of Serbia, Ministry of Defence:
http://www.mod.gov.rs/sadrzaj.php?id_sadrzaja=4353
Internet presentation, Serbian Armed Forcese:
www.vs.rs
Internet presentation, Republic of Serbia, Anticorruption Agency:
www.acas.rs
Internet presentation, Republic of Serbia, Government's Anticorruption Council:
www.antikorupcija-savet.gov.rs
Internet presentation, Republic of Serbia, Statistical Office:
www.stat.gov.rs
Internet presentation, "Transparency Serbia"
www.transparentnost.org.rs
Internet presentation, Belgrade Center for Security Policy:
www.bezbednost.org

Experience of the Serbian Ministry of Defence and the Serbian Armed Forces from the Engagement in the NATO Building Integrity Programme (2011-2017)

Effects of the lessons learned[54]

Activity		Effects achieved		
		Integrity Built	Transparency Increased	Accountability Improved
1.	Development of Integrity Plans at institutions of the MoD&SAF	X		X
2.	Established practice of regular informing on all the public procurements at the web-site of the MoD&SAF[55]		X	X
3.	Comprehensive approach to answering the Self-Assessment Questionnaire	X	X	
4.	Joint check of the answers from the *Self-Assessment Questionnaire* (of the NATO Peer Review Team and representatives of the MoD&SAF)	X	X	
5.	Improved communication between organizational units of the MoD&SAD, as well as with other governmental institutions.	X	X	X
6.	Public disclosure of the *Self-Assessment and Peer Review Report*		X	
7.	Using recommendations from the *Self-Assessment and Peer Review Report* as the base for development of the first Annual Plan of BI activities (in 2014).	X		X
8.	Intensive exchange of information between the MoD&SAF, "Transparency International United Kingdom" and the authorized evaluator within the "the Government Defence Anti-Corruption Index" research.		X	
9.	Cooperation with the NGO "Belgrade Center for Security Policy"	X	X	
10.	Constant informing on BI activities of the national defence system through information assets of the MoD and national media.		X	

[54] Estimated effects are listed in 3 categories, based on recommendation from the Chapter 2 of the NATO BI Compendium, Francois Melese, *A Strategic Approach to Building Integrity and Reducing Corruption in Defence*, (2010) Building Integrity and Reducing Corruption in Defence, A Compendium of Best Practices, Geneva, NATO, DCAF, 13-21.

[55] Official web-site of the Serbian MoD, subdomain on public procurement: http://www.nabavke.mod.gov.rs.

DCAF

a centre for security, development and the rule of law

Geneva Centre for the Democratic Control of Armed Forces